



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

DEC 15 2016

Mary M. Abrams, Ph.D., Field Supervisor
Pacific Islands Fish and Wildlife Office
U.S. Fish and Wildlife Service
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawaii 96850

Subject: Supplemental Final Environmental Impact Statement for the Na Pua Makani Wind Project and Habitat Conservation Plan, Kahuku, Hawaii [CEQ# 20160282]

Dear Ms. Abrams:

The U.S. Environmental Protection Agency has reviewed the Supplemental Final Environmental Impact Statement for the Na Pua Makani Wind Project and Habitat Conservation Plan. Our comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality Regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The EPA continues to support the state of Hawaii in using clean energy to meet 100 percent of its energy needs by the year 2045. Developing renewable energy resources, while aiming to reduce environmental impacts as much as possible, are key components of this process.

The EPA reviewed the Final Environmental Impact Statement and provided comments to the U.S. Fish and Wildlife Service on August 19, 2016. On August 15, 2015, we rated the Draft Environmental Impact Statement as *Environmental Concerns – Insufficient Information* (EC-2) due to concerns about potential impacts to aquatic resources, the proximity of the wind turbines to nearby residents, and potential impacts of noise and shadow flicker.

The FWS has decided to publish a SFEIS and provide another opportunity for public review of the Modified Proposed Action Option (the refined Project design with fewer but larger wind turbines). The SFEIS provides clarification on three topics – threatened and endangered species, traffic, and public health – as noted in Sections 4.11, 4.17, and 4.18, respectively.

We commend the FWS for the extensive interagency coordination on this project and appreciate the additional information that has been incorporated into the SFEIS. We are pleased to see the additional discussion regarding the risk of bird and bat collisions with wind turbines, as presented in Section 4.11.3. As noted, the literature indicates conflicting results as to whether fatalities increase with wind turbine size. To account for uncertainties associated with turbine size and number, assumptions based on the best available information were used in estimating take of bird and bat species addressed in the Project HCP.

In our August 19, 2016 comment letter, we expressed concern that while the FEIS cited multiple scientific reviews which evaluated reports of wind turbine-related health effects, the excerpts presented could be interpreted to conclude that there are no health effects due to wind-turbines, when it would be more appropriate to state that additional studies are warranted. We are pleased to see that the SFEIS now clarifies that scientists and medical experts from around the world continue to publish on these topics, and due to the inherent limitations of available studies for drawing definitive conclusions about health-related concerns, additional research is needed to address current data gaps.

We continue to recommend that post-construction noise monitoring be conducted at the locations of sensitive receptors to verify predicted noise levels (including low frequency and infrasound) and to ensure compliance with Hawaii noise regulations. We also recommend that additional outdoor and indoor monitoring be considered as a possible follow-up action to better understand and address any unresolved noise complaints. We also recommend including in the Record of Decision a commitment for resolving complaints, if any, about shadow flicker and providing more detailed information regarding the time and duration of shadow flicker to parties affected, upon request.

We recommend that all mitigation measures, including those recommended in this letter, be adopted in the ROD, and be included as conditions in construction contracts and other approvals, as appropriate. If there are additional details regarding the Community Benefits Package at the time the ROD is prepared, please also incorporate them into the ROD. If any mitigation measures proposed in the SFEIS are not adopted, the ROD should provide the basis for the decision not to adopt them.

We appreciate the opportunity to review this SFEIS and are available to discuss our comments. When the ROD is released for public review, please send one hard copy to the address above (Mail Code: ENF-4-2). If you have any questions, please contact me at 415-947-4161, or contact Ann McPherson, the lead reviewer for this project. Ann can be reached at 415-972-3545 or mcpherson.ann@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Connell Dunning". The signature is fluid and cursive, with the first name "Connell" being more prominent than the last name "Dunning".

Connell Dunning, Acting Manager
Environmental Review Section